

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF VIRGINIA  
Richmond Division**

CAROLYN CLARK, *et al.*, on behalf of  
themselves and all others similarly situated,

Plaintiffs,

v.

Case No. 3:16-cv-00032 (MHL)

EXPERIAN INFORMATION SOLUTIONS,  
INC.,

Defendant.

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FRANCES D. BROWN, *et al.*, on behalf of  
themselves and all others similarly situated,

Case No. 3:16-cv-00670 (MHL)

Plaintiffs,

v.

EXPERIAN INFORMATION SOLUTIONS,  
INC.,

Defendant.

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**PLAINTIFFS' MOTION FOR PRELIMINARY APPROVAL  
OF CLASS ACTION SETTLEMENT, CONDITIONALLY CERTIFYING CLASS  
FOR PURPOSE OF SETTLEMENT, APPOINTING CLASS COUNSEL,  
DIRECTING NOTICE TO THE CLASS, AND  
SCHEDULING FINAL FAIRNESS HEARING**

Plaintiffs<sup>1</sup> on behalf of themselves and all others similarly situated (the “Settlement Class”), pursuant to Fed. R. Civ. P. 23(b)(2) and 23(e) move for preliminary approval of the class action Stipulation and Agreement of Settlement (“Settlement Agreement” or “Settlement”) with Defendant Experian Information Solutions, Inc. (“Defendant” or “Experian”) and now seek an order from the Court (1) preliminarily approving the class action settlement, (2) scheduling a final fairness hearing, (3) certifying the proposed Settlement Class for purposes of the proposed settlement only, and (4) appointing Class Counsel.<sup>2</sup>

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<sup>1</sup> Plaintiffs have moved in *Brown v. Experian Information Solutions, Inc.*, Civil Action No. 3:16-cv-000670, to consolidate these two cases for the purpose of settlement. The Settlement Agreement is

<sup>2</sup> Plaintiffs will be separate filing move the Court for approval of the proposed Notice process and settlement administrators pursuant to Fed. R. Civ. P. 23(c).

Respectfully submitted,

**PLAINTIFFS,**

*individually and on behalf of all  
others similarly situated*

By: \_\_\_\_\_/s/

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*Counsel for the Plaintiffs*

**CERTIFICATE OF SERVICE**

I hereby certify that on the 17<sup>th</sup> day of September 2018, I will electronically file the foregoing with the Clerk of Court using the CM/ECF system, which will then send a notification of such filing (NEF) to all counsel of record.

/s/

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